

LAQUER, URBAN, CLIFFORD & HODGE LLP

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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

TRUSTEES OF THE OPERATING
ENGINEERS PENSION TRUST; TRUSTEES
OF THE OPERATING ENGINEERS HEALTH
AND WELFARE FUND; TRUSTEES OF THE
OPERATING ENGINEERS JOURNEYMAN
AND APPRENTICE TRAINING TRUST; AND
TRUSTEES OF THE OPERATING
ENGINEERS VACATION-HOLIDAY
SAVINGS TRUST,

Plaintiffs,

vs.

WESTERN EXPLOSIVES SYSTEMS
COMPANY, a Delaware corporation,

Defendant.

CASE NO.: 2:16-cv-02473-GMN-CWH

**JOINT STIPULATION AND
PROPOSED ORDER SETTING
DEADLINES**

Plaintiffs, TRUSTEES OF THE OPERATING ENGINEERS PENSION TRUST; TRUSTEES
OF THE OPERATING ENGINEERS HEALTH AND WELFARE FUND; TRUSTEES OF THE
OPERATING ENGINEERS JOURNEYMAN AND APPRENTICE TRAINING TRUST; AND
TRUSTEES OF THE OPERATING ENGINEERS VACATION-HOLIDAY SAVINGS TRUST, by and
through their counsel of record, Laquer, Urban, Clifford & Hodge, LLP, and Defendant, WESTERN
EXPLOSIVES SYSTEMS COMPANY, a Delaware corporation (“WESCO”), by and through its

1 counsel of record, Clark Law Counsel, hereby jointly stipulate and propose as follows, subject to the
2 approval of this Court:

- 3 (1) Defendant will produce to Plaintiffs on or before April 5, 2018 the list of documents and
4 information counsel discussed and exchanged at their March 22, 2018 meet and confer;
5 (2) Plaintiffs' auditor, through Plaintiffs' counsel, will produce audit results on or before April
6 19, 2018 to Defendant, through its counsel;
7 (3) On or before May 3, 2018, the parties will file a second status report with the Court to
8 discuss the need for an additional settlement conference;
9 (4) While the parties and their counsel work on production of the documents discussed at their
10 meet and confer, the parties request the Court hold decision on Plaintiff's Motion for Order
11 to Show Cause (ECF No. 27) in abeyance until at least May 17, 2018, which is two weeks
12 after the parties are to file their second joint status report.
13 (5) In addition, the parties jointly request the Court permit Plaintiffs up and until May 10, 2018
14 to file their Reply in Support of their Motion for Order to Show Cause, which is currently
15 due on March 26, 2018.

16 The parties, through their counsel, certify that this stipulation and proposed order thereon are
17 filed in good faith and not filed for the purposes of delaying these proceedings in anyway.

18 **ORDER**

19 Based upon the joint stipulation of the parties and with good cause appearing, the parties'
20 stipulation and requested deadlines are approved.

21 **IT IS SO ORDERED.**

22 Dated March 27, 2018

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25 UNITED STATES MAGISTRATE JUDGE
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3 Respectfully submitted:

4 **LAQUER, URBAN, CLIFFORD & HODGE LLP**

5 /s/ Nathan R. Ring

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10 *Attorneys for Plaintiffs*

11 **CLARK LAW COUNSEL**

12 /s/ Dustin L. Clark

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15 *Attorney for Defendant*

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2 **CERTIFICATE OF SERVICE**

3 The undersigned hereby states that on this 26th day of March, 2018, she filed a true and correct
4 copy of the above and foregoing, **JOINT STIPULATION AND PROPOSED ORDER SETTING**
5 **DEADLINES**, through the Court's electronic CM/ ECF filing service, which will send notice and serve
6 a copy of the above and foregoing document on all registered ECF participants in the case including the
7 following:

8 Dustin Clark, Esq.
9 Clark Law Counsel
10 *Counsel for WESCO*

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12 /s/ April Denni
13 An employee of LAQUER, URBAN, CIFFORD &
14 HODGE, LLP
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